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Reply to: John H. Tucker
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January 16, 2008

VIA EMAIL ONLY

Mr. Richard T. Garren
Riggs Abney Neal Turpen
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502 W. 6th Street
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Re: *State of Oklahoma v. Tyson*
Our File No. 1790-2

Dear Richard:

I have now reviewed your e-mail correspondence dated a day or so ago concerning the deposition of Ms. Phillips tomorrow. You suggest Ms. Phillips may become a designated 30(b)(6) witness for the State and identify some of the areas in which she may be a witness. We have not noticed a 30(b)(6) witness for tomorrow. Further, I could not be prepared to take such a deposition on such short notice. Finally, having reviewed Judge Joyner's Minute Order of this afternoon, it seems clear all 30(b)(6) witness issues are deferred until after the Preliminary Injunction hearing.

Thank you for your attention.

Very truly yours,



John H. Tucker

JHT:law

